

CLARKSON LAW FIRM, P.C.
Ryan J. Clarkson (CA SBN 257074)
rclarkson@clarksonlawfirm.com
Yana Hart (CA SBN 306499)
yhart@clarksonlawfirm.com
22525 Pacific Coast Highway
Malibu, CA 90265
Tel: (213) 788-4050

CLARKSON LAW FIRM, P.C.
Tracey Cowan (CA SBN 250053)
tcowan@clarksonlawfirm.com
95 3rd St., 2nd Floor
San Francisco, CA 94103
Tel: (213) 788-4050

Counsel for Plaintiffs and the Proposed Classes

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.
individually, and on behalf of all other similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

CLASS ACTION

**JOINT STIPULATION TO FILE FIRST
AMENDED COMPLAINT PURSUANT
TO FED. R. CIV. P. 15(a)(2), TO EXTEND
TIME TO FILE FIRST AMENDED
COMPLAINT, AND TO CONTINUE
CASE MANAGEMENT CONFERENCE**

COMPLAINT FILED: July 11, 2023

**JOINT STIPULATION TO FILE FAC, TO EXTEND TIME TO FILE FAC, AND TO
CONTINUE CASE MANAGEMENT CONFERENCE**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Civil Local Rules 6-2 and 7-12, Plaintiffs J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R. (“**Plaintiffs**”) and Defendant Google LLC (“**Defendant**”) (collectively, “**Parties**”), by and through their respective counsel, hereby stipulate to Plaintiffs filing an amended complaint (“**FAC**”) on or before January 5, 2024 and to continuing the Case Management Conference and related deadlines, as follows:

RECITALS

1. WHEREAS, Plaintiffs filed the Class Action Complaint on July 11, 2023 (“**Complaint**”), asserting ten causes of action: (1) violation of California Unfair Competition Law, Bus. & Prof. Code § 17200 et seq.; (2) negligence; (3) invasion of privacy under California constitution; (4) intrusion upon seclusion; (5) larceny/receipt of stolen property; (6) conversion; (7) unjust enrichment; (8) direct copyright infringement; (9) vicarious copyright infringement; and (10) violation of Digital Millennium Copyright Act, 17 U.S.C. § 1202(b) (ECF 1);

2. WHEREAS, Defendant filed its motion to dismiss the Complaint on October 16, 2023 (ECF 20);

3. WHEREAS, after reviewing Defendant’s motion, Plaintiffs requested Defendant to stipulate to extend their deadline to amend the complaint, to which Defendant has agreed;

4. WHEREAS, Plaintiffs filed their notice of intent to file a first amended complaint in lieu of opposition to Defendant’s motion to dismiss on October 30, 2023 (ECF 25), and this stipulation follows;

5. WHEREAS, the Parties agree that it would be more efficient and orderly for the Case Management Conference to take place after the operative complaint has been filed and the Parties have had an opportunity to consider that complaint and meet and confer concerning a discovery and case management plan in light of that complaint;

STIPULATION

NOW, THEREFORE, the parties further stipulate and agree, subject to the approval of the Court, as follows:

- i. Plaintiffs may file a FAC on or before January 5, 2024;

- ii. The Initial Case Management Conference, currently scheduled for November 30, 2023 at 10 a.m., shall be continued to February 22, 2023 at 10 a.m.;
- iii. the Parties' joint case management statement shall be filed by February 15, 2023; and
- iv. the Parties shall make their Rule 26(a) initial disclosures by February 15, 2023.

IT IS SO STIPULATED.

DATED: November 3, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart

Ryan J. Clarkson, Esq.

Yana Hart, Esq.

Tracey Cowan, Esq.

Attorneys for Plaintiffs and the Proposed Classes

DATED: November 3, 2023

WILSON SONSINI GOODRICH & ROSATI

/s/ Eric P. Tuttle

Eric P. Tuttle, Esq.

Attorneys for Defendant Google LLC

ATTESTATION UNDER LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: November 3, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart

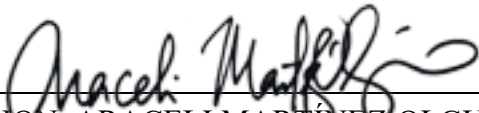
Yana Hart, Esq.

~~PROPOSED~~ ORDER *As Modified By the Court*

PURSUANT TO STIPULATION, IT IS SO ORDERED:

- i. Plaintiffs may file a FAC on or before January 5, 2024;
- ii. The Initial Case Management Conference, currently scheduled for November 30, 2023 at 10 a.m., shall be continued to February 22, 2024 at 10 a.m.;
- iii. the Parties' joint case management statement shall be filed by February 15, 2024;
- iv. the Parties shall make their Rule 26(a) initial disclosures by February 15, 2024;
- v. the Motion to Dismiss, ECF 20, is terminated as moot.

DATED: November 3, 2023



HON. ARACELI MARTÍNEZ-OLGUÍN
UNITED STATES DISTRICT COURT JUDGE